

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

**DEPARTMENT OF HOMELAND
SECURITY, IMMIGRATION AND
CUSTOMS ENFORCEMENT,**

Petitioner,

v.

GABAR CHOLI,

Respondent.

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CASE NO. 1:25-CV-104

**PETITIONER’S MOTION FOR ISSUANCE OF SUMMONS AND ORDER DIRECTING
U.S. MARSHAL OFFICE TO SERVE SUMMONS AND PETITION**

Petitioner, United States Department of Homeland Security, Immigration and Customs Enforcement, by and through, NICHOLAS J. GANJEI, United States Attorney, respectfully moves this Honorable Court for an Order, pursuant to Rule 4(c)(3) of the Federal Rules of Civil Procedure, directing that the Clerk of the Court issue a summons (see attached) and have said summons with a copy of the petition filed herein served upon Respondent at Port Isabel Detention Center, 27991 Buena Vista Blvd., Los Fresnos, TX 78566. The Federal Rules of Civil Procedure allow for service to be made by any person over the age of eighteen who is not a party in this litigation. The Petitioner herein is an agency/department of the United States of America. Given

its unique stature as a party herein, it seems appropriate that the U.S. Marshal's Service be directed to perfect service herein.

WHEREFORE PREMISES CONSIDERED, Petitioner asks that a summons be issued by the Clerk of the Court and that the U.S. Marshal's Office be directed to serve a copy of this summons and a copy of the Petition filed herein as addressed on the summons.

Respectfully submitted, this 29th day of May, 2025.

Respectfully submitted,

NICHOLAS J. GANJEI
UNITED STATES ATTORNEY

s/ *Nancy L. Masso*
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CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2025, I electronically transmitted the attached **Motion** to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants: N/A

I hereby further certify that on May 29, 2025, I forwarded the attached document to officials at the Port Isabel Detention Center and directed that a copy be served by in-person delivery on the Respondent Gabar Choli.

This 29th day of May, 2025.

NICHOLAS J. GANJEI
UNITED STATES ATTORNEY

s/ Nancy L. Masso
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